

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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POLYSCIENCES, INC.,

Plaintiff/Counter-Defendant,

v.

JOSEPH T. MASRUD,

Defendant/Counter-Plaintiff.

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Civil Action No. 2:20-cv-03649-PBT

**DEFENDANT/COUNTER-PLAINTIFF'S MOTION FOR LEAVE TO FILE  
REPLY BRIEF IN FURTHER SUPPORT OF  
MOTION TO COMPEL PLAINTIFF/COUNTER-DEFENDANT TO DE-DESIGNATE  
ITS ATTORNEYS' EYES ONLY PRODUCTION AND FOR SANCTIONS**

Defendant/Counter-Plaintiff Joseph T. Masrud hereby respectfully moves this Honorable Court for leave to file a reply brief in further support of his Motion to Compel Polysciences to de-designate its attorneys' eyes only production and for sanctions. This reply brief is necessary to correct erroneous factual statements and arguments in Plaintiff's opposition to Masrud's motion.

The proposed reply brief is submitted with this Motion.

Dated: January 27, 2021

Respectfully submitted,

HOMANS PECK, LLC

/s/ Julianne L. Peck

Julianne L. Peck, Esquire

43 Paoli Plaza #426

Paoli, PA 19301

Telephone: (215) 868-6214

jpeck@homanspeck.com

*Attorney for Defendant*

*Joseph T. Masrud*

**CERTIFICATE OF SERVICE**

I, Julianne Peck, hereby certify that the foregoing Defendant/Counter-Plaintiff's Motion to Compel Plaintiff/Counter-Defendant to De-Designate its Attorneys' Eyes Only Production and For Sanctions was filed using the Court's electronic filing system on the 27th day of January, 2021 and served upon all counsel of record via ECF notification.

/s/ Julianne Peck  
JULIANNE PECK